



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

April 1, 2025

Via ECF

Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Lorenzo Hunt v. E. Richard, Warden, FCI Otisville, 25-CV-0989 (PAE)*

Dear Judge Engelmayer:

This Office represents the Government in the above-referenced petition for a writ of habeas corpus under 28 U.S.C. § 2241 (the "Petition"), alleging the Bureau of Prisons ("BOP") failed to apply time credits earned under the First Step Act toward prerelease custody or supervised release as provided under 18 U.S.C. § 3632(d)(4)(C).

I write respectfully to request a one-week extension of time to respond to the Petition, from April 7, 2025, to April 14, 2025. The reason for this request is that I need additional time to discuss the matter with the BOP and gather documentation to fully respond to the Petition. Due to the Petitioner's incarcerated status, I did not seek his position on this request. This is the Government's first request for an extension of this deadline.

Respectfully submitted,

MATTHEW PODOLSKY
Acting United States Attorney for the
Southern District of New York

GRANTED.

SO ORDERED.

By: /s/ Rachel Kroll
Rachel Kroll
Assistant United States Attorney
86 Chambers Street, Third Floor
New York, New York 10007
Tel.: (212) 637-2769
E-mail: rachel.kroll@usdoj.gov
Attorney for the Government

Paul A. Engelmayer
PAUL A. ENGELMAYER
United States District Judge

April 1, 2025
New York, New York

cc: Lorenzo Hunt, *Pro Se* (by mail)